

SERVED FEB 16 1996



**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

Issued by the Department of Transportation
on the 16th day of February, 1996

Applications of

SUN PACIFIC INTERNATIONAL, INC.

for certificates of public convenience and necessity
under 49 U.S.C. 41102 to engage in interstate and
foreign charter passenger air transportation

**Dockets OST 95-585
OST 95-586**

ORDER TO SHOW CAUSE

Summary

By this order, we tentatively conclude that Sun Pacific International, Inc. (SPI) is a citizen of the United States and is "fit, willing, and able" to provide interstate and foreign charter passenger air transportation as a certificated air carrier.

Background

Section 41102 of Title 49 of the United States Code (Transportation) (the "statute") directs us to determine whether applicants for certificate authority to provide interstate and foreign charter air transportation are fit, willing, and able to perform such transportation and to comply with the statute and the regulations of the Secretary. In making fitness findings, the Department uses a three-part test that reconciles the Airline Deregulation Act's liberal entry policy with Congress' concern for operational safety and consumer protection. The three areas of inquiry that must be addressed in order to determine a company's fitness are whether the applicant (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) will have access to financial resources sufficient to commence operations without posing an undue risk to consumers, and (3) will comply with the statute and regulations imposed by Federal and State agencies. We must also find that the applicant is a U.S. citizen.

On September 6, 1995, SPI filed applications in Dockets OST-95-585 and OST 95-586 for certificates to provide interstate and foreign charter air transportation pursuant

to 49 U.S.C. 41102. SPI accompanied its applications with the fitness information required by section 204.3 of the Aviation Economic Regulations.

No answers to SPI's applications have been filed, and no special issues regarding the applicant have come to our attention. Under these circumstances, we propose to decide the issue of the applicant's fitness on the basis of the written record, and we tentatively conclude that SPI is a U.S. citizen and is fit, willing, and able to operate its proposed charter passenger service. However, we will give interested persons an opportunity to show cause why we should not adopt as final the tentative findings and conclusions stated herein.

FITNESS

The Company

SPI is a corporation organized under the laws of the State of Arizona that was founded in July 1995. SPI proposes to provide subservice to other charter air carriers when their aircraft are out of service for maintenance or other reasons. SPI proposes to provide this service using one B727-200 aircraft. The service will be operated with SPI responsible for the aircraft, crew, maintenance and insurance with the contracting air carrier being responsible for fuel, ground handling, landing fees and associated costs. Messrs. Jonathan Andron and Albert Ehringer will provide financial backing through the purchase of all of the company's stock and will be the sole members of SPI's Board of Directors.

Managerial Competence

Mr. Jonathan Andron, who will hold 89.24 percent of SPI's stock, is an investment money manager and real estate investor. Mr. Albert Ehringer, a retired land developer with extensive real estate investments, will hold 10.76 percent of SPI's stock. These individuals will serve as the sole members of the Board of Directors, but will not play a role in the day-to-day operations of the carrier. Both are U.S. citizens.

Mr. Robert Fleming, SPI's President, Director of Operations and General Manager, will be responsible for the day-to-day operations of the carrier. Mr. Fleming has an extensive aviation background. Prior to forming SPI, he founded Sportsflight Airways, a Part 121 charter air carrier, in October 1993 and served as its President until August 1995. He has also served as President of Viscount Air Service, Trans International Airlines and TPI International Airlines. In March 1973, he founded Fleming International Airways and served as its Chief Executive Officer and President until August 1983. He holds an FAA Airline Transport Pilot certificate and has logged over 14,000 flight hours.

Mr. Steven Birdman will serve as SPI's Vice President of Maintenance/Quality Control. He began his aviation career as an Aviation Electronics Technician while serving in the U.S. Navy. In February 1969 he founded World West Aviation, which

operated flight schools and leased aircraft. In February 1973, he cofounded GO, Inc., a company involved in air taxi, aircraft leasing and aviation-related transportation consulting. He subsequently served as Director of Technical Services with Viscount Air Service and Sportsflight Airways. For the past 14 years, he has owned Birdman Air Enterprises, an aviation consulting firm.

Mr. Michael Finnegan, SPI's Director of Maintenance, has been with the company since August 1995. He began his aviation career while serving in the U.S. Navy as a jet mechanic. Beginning his civilian aviation career in June 1972 as an aircraft mechanic/pilot with TBM Inc., a company conducting Part 135 operations for the U.S. Forest Service, he progressed to positions of Director of Maintenance and Maintenance Supervisor for Part 125 and 121 operators including Go Airlines, Starship and Viscount Air Service, where he was employed for two years prior to joining SPI. He holds an FAA Airframe and Powerplant Mechanic certificate and Airline Transport Pilot certificate. Mr. Finnegan has logged over 5,500 flight hours.

Mr. Steven Shattuck, SPI's Chief Pilot, has been associated with the company since October 1995. He attended Embry Riddle Aeronautical University where he received a Bachelor of Science Degree in Aeronautical Science. He began his aviation career in February 1980 as a pilot with Daytona Beach Aviation, a Part 135 operator. From then until joining SPI in October 1995, Mr. Shattuck served as either First Officer or Captain for several Part 121 and 135 air carriers, including Cal West Air, Wing West Airlines, Evergreen International Airlines, DHL Airways and Sportsflight Airways. He holds an FAA Airline Transport Pilot certificate and has logged over 8,600 flight hours.

Mr. Robert Sheverbush, SPI's Chief Inspector, has been with the company since October 1995. In December 1991, he graduated from Spartan School of Aeronautics and received his FAA Airframe and Powerplant Mechanic license. His first position in the aviation industry was as a mechanic with Gameco, a subsidiary of Lockheed. In March 1992, he joined Lockheed Aeromod Center as a mechanic. In June 1994, he joined Sportsflight Airways where he was employed as Chief Inspector until joining SPI as Chief Inspector.

On the basis of all of the above, we tentatively conclude that SPI will have the necessary managerial and technical capability to conduct the operations that it proposes.¹

Financial Plan and Operating Proposal

¹ Before authorizing a carrier to conduct air transportation operations, the FAA also evaluates certain of the carrier's key personnel with respect to the minimum qualifications for those positions as prescribed in the Federal Aviation Regulations. The FAA's evaluation of these key personnel provides an added practical and in-person test of their skills and technical ability. The FAA has advised us that the key technical personnel listed above are acceptable to it.

If granted the certificate authority it seeks, SPI plans to provide subservice to other Part 121 charter air carriers using its B727 aircraft. It does not intend to market its services directly to the public or to tour operators or other charter organizers. In providing such service, SPI will be responsible for providing the aircraft, crew, maintenance and insurance. The contracting air carrier will be responsible for fuel, ground handling, landing fees and other associated costs.

SPI has provided forecasts of its anticipated pre-operating and operating expenses for its first year of operations. These forecasts indicate that SPI anticipates that it will incur approximately \$621,000 in start-up costs and another \$630,000 in operating expenses during three months of normal operations. The carrier's expenses are based, in part, on its management team's experience in operating B727 aircraft and corroboration from third-party vendors. We have reviewed SPI's expense forecasts and find that they appear to be reasonable.

In evaluating an applicant's financial fitness, the Department generally asks that the company have available to it resources sufficient to cover all pre-operating costs plus a working capital reserve equal to the operating costs that would be incurred in three months of normal certificated operations.² SPI requires funds of \$1.25 million to cover all forecast pre-operating costs and to provide a three-month working capital reserve.

The capital will be provided through the purchase of all of SPI's stock by Messrs. Andron and Ehringer, who will hold 89.24 percent and 10.76 percent, respectively.³ When fully subscribed a total of \$1.3 million will be provided to meet SPI's capital needs. Thus far, Mr. Andron has supplied \$500,000 with Mr. Ehringer having provided \$75,000.

Therefore, we tentatively conclude that SPI has sufficient financial resources available to it to enable it to commence its proposed limited charter passenger operations without posing an undue risk to consumers or their funds. However, should SPI significantly expand its operations, such as through the acquisition of additional aircraft, the financial fitness determination may no longer be valid.

Therefore, as more fully discussed in the "Certificate Conditions and Limitations" section below, we have decided to limit SPI's authority. Furthermore, since all of the stock has not been subscribed at this time, we will require the company to provide to the Department, at the time that it seeks to have its authority made effective, updated

² Because projected operations during one or more of the first three months of anticipated actual air transportation services frequently do not include all costs of operations that will be incurred during a normal period of operations, it is our practice to base our three-month test on one quarter of the first year's operating cost forecast. In calculating available resources, projected revenues cannot be used.

³ In support of meeting its capital needs, SPI provided financial statements for Messrs. Andron and Ehringer which attest to their ability to provide the funding to which they have committed in meeting SPI's capital requirements.

information on the costs it has incurred, and verification that it has, in fact, received funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.

Compliance Disposition

The applicant states that there are no actions or outstanding judgments against it, its owners, or its key personnel, nor have any charges of unfair, deceptive or anti-competitive business practices, or of fraud, felony or antitrust violations been brought against any of these parties in the past ten years. SPI states further that there have been no formal complaints filed in the past five years or orders issued in the past ten years finding it, its key personnel, or persons having a substantial interest in it to be in violation of the statute or of the Federal Aviation Regulations.

As indicated above, Mr. Fleming has served as President of Viscount and Sportsflight. Prior to the issuance of the order tentatively finding Viscount fit to provide air transportation (*See* Order 92-8-33), that company entered into a settlement agreement with the Department's Aviation Enforcement Office regarding violations of certain sections of the Federal Aviation Act and the Department's regulations (*See* Order 92-8-26). These violations involved holding out and providing air transportation for which Viscount did not hold the requisite economic authority. The company was ordered to cease and desist from further violations and a civil penalty was assessed. Mr. Fleming left Viscount in June 1993 to form Sportsflight Airways. In the show cause order finding Sportsflight tentatively fit to provide charter air transportation (Order 94-4-10), the Department discussed the Viscount compliance matter. Although it was of significant concern, the Department stated that it did not find sufficient grounds to warrant a negative finding with respect to Sportsflight's application, and the same is true here with regard to SPI.

With the exception of the above, our search of the Department's records found no compliance problems with SPI, its owner, officers or key personnel which would lead us to conclude that SPI will not also demonstrate a satisfactory compliance disposition. The FAA has advised us that it knows of no reason why we should act unfavorably on this request.

Based on these considerations, we tentatively conclude that SPI has the proper regard for the laws and regulations governing its services to ensure that its aircraft and personnel will conform to applicable safety standards and that acceptable consumer relations practices will be followed.

CITIZENSHIP

Section 41102 requires that certificates to engage in air transportation be held only by citizens of the United States as defined in 49 U.S.C. 40102(a)(15). That section requires that the president and two-thirds of the Board of Directors and other managing officers be U.S. citizens and that at least 75 percent of the outstanding voting stock be owned by U.S. citizens. We have also interpreted the statute to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

All of SPI's issued and outstanding stock is held by Messrs. Andron and Ehringer, both of whom are U.S. citizens. SPI's President and all of its key personnel are U.S. citizens. Moreover, SPI has provided an affidavit attesting that it is a citizen of the United States within the meaning of the statute and that it is actually controlled by U.S. citizens. Our review of the applicant has uncovered no reason to suggest that control of SPI rests with non-U.S. citizens.

Based on the above, we tentatively conclude that SPI is a citizen of the United States and is fit, willing, and able to conduct the charter operations proposed in its applications in Dockets OST-95-585 and 586.

PUBLIC CONVENIENCE AND NECESSITY

No finding of consistency with the public convenience and necessity is required for the award of authority for interstate charter passenger air transportation under section 41102, although such a finding is required for authority to engage in foreign charter air transportation. We tentatively find that the foreign charter passenger air transportation proposed by SPI is consistent with the public convenience and necessity. By Order 78-7-106, which instituted the *Former Large Irregular Air Service Investigation*, the Civil Aeronautics Board found that there was a continuing demand and need for additional charter air carriers. These findings remain valid and apply to the authority sought by SPI. Therefore, if SPI meets the fitness requirements of the statute, it will receive certificates authorizing it to engage in interstate and foreign charter passenger air transportation.⁴

OBJECTIONS

We will give interested persons 10 days following the service date of this order to show cause why the tentative findings and conclusions set forth here should not be made final; answers to objections will be due within 5 days thereafter. We expect such persons to direct their objections, if any, to the applications and points at issue and to support such objections with detailed economic analyses. If an oral evidentiary hearing or discovery procedures are requested, the objector should state in detail why

⁴ Pursuant to 49 U.S.C. 41307, issuance of foreign authority to the applicant is subject to Presidential review.

such a hearing or discovery is considered necessary, and what material issues of decisional fact the objector would expect to establish through a hearing or discovery that cannot be established in written pleadings. The objector should consider whether discovery procedures alone would be sufficient to resolve material issues of decisional fact. If so, the type of procedure should be specified *See* Part 302, Rules 19 and 20); if not, the reasons why not should be explained. We will not entertain general, vague, or unsupported objections. If no substantive objections are filed, we will issue an order that will make final our tentative findings and conclusions with respect to SPI's fitness and certification.

CERTIFICATE CONDITIONS & LIMITATIONS

If SPI is found fit and issued the certificates it seeks, its authority to conduct passenger operations will not become effective until the company has fulfilled all requirements for effectiveness as set forth in the attached Terms, Conditions, and Limitations⁵. Among other things, this includes evidence that it has obtained an Air Carrier Certificate and Operations Specifications from the FAA authorizing it to conduct charter passenger service with its B727 aircraft and evidence of liability insurance coverage that meets the requirements of Part 205 of our rules for that aircraft.

Furthermore, we remind SPI of the requirements of 49 U.S.C. 41110(e). Specifically, that section requires that, once a carrier is found fit initially, it must remain fit in order to hold its authority. To be assured that certificated air carriers continue to be fit after effective authority has been issued to them, we require that they supply information describing any subsequent substantial changes they may undergo in areas affecting fitness. As stated above, critical to our tentative findings and conclusions of fitness for this company is the limited service that SPI proposes to operate under its certificate authority. Our findings, particularly those regarding the adequacy of its financial resources, may not hold true if the company were to substantially change the scope of its operations through the acquisition of additional large aircraft. Therefore, once the applicant's certificate becomes effective, we will require that, should SPI propose to acquire additional aircraft, it must first inform the Department and file information demonstrating its fitness prior to initiation of such changes. Furthermore, should SPI propose substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules⁶.

⁵ We also reserve the right to stay the effectiveness of SPI's authority if any new information becomes available to us that warrants such action.

⁶ The carrier may contact our Air Carrier Fitness Division to report proposed substantial changes in its operations, ownership, or management, and to determine what additional information, if any, will be required under section 204.5. If the carrier fails to file the information or if the information fails to demonstrate that the carrier will continue to be fit upon implementation of the substantial change, the Department may take such action as is appropriate, including enforcement action or steps to modify, suspend, or revoke the carrier's certificate authority.

ACCORDINGLY,

1. We direct all interested persons to show cause why we should not issue orders making final the tentative findings and conclusions stated above and award certificates to Sun Pacific International, Inc., authorizing it to engage in (a) interstate charter passenger air transportation, and (b) foreign charter passenger air transportation, subject to the attached specimen Terms, Conditions, and Limitations.
2. We direct any interested persons having objections to the issuance of orders making final any of the proposed findings, conclusions, or the certificate awards set forth here to file them with the Documentary Services Division, Department of Transportation, 400 Seventh Street, SW, Washington, D.C. 20590, in Dockets OST-95-585 and 95-586 and serve them upon all persons listed in Attachment A no later than 10 days after the service date of this order; answers to objections shall be filed no later than 5 days thereafter.
3. If timely and properly supported objections are filed, we will accord full consideration to the matters or issues raised by the objections before we take further action.⁷
4. In the event that no objections are filed, we will consider all further procedural steps to be waived and we will enter orders making final our tentative findings and conclusions.
5. We will serve a copy of this order on the persons listed in Attachment A.
6. We will publish a summary of this order in the Federal Register.

By:

CHARLES A. HUNNICUTT
Assistant Secretary for
Aviation and International Affairs

(SEAL)

⁷ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.

*An electronic version of this order is available on the World Wide Web at
<http://www.dot.gov/dotinfo/general/orders/aviation.html>.*

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Attachment

SPECIMEN



Terms, Conditions, and Limitations

SUN PACIFIC INTERNATIONAL, INC.

is authorized to engage in interstate charter air transportation of persons, property, and mail between any point in any State, territory, or possession of the United States or the District of Columbia, and any other point in any of those entities.

This authority is subject to the following provisions:

(1) The authority to operate under this certificate will not become effective until six (business) days after the Department has received the following documents; provided, however, that the Department may stay the effectiveness of this authority at any time prior to that date:

(a) A copy of the holder's Air Carrier Certificate and Operations Specifications authorizing such operations from the Federal Aviation Administration (FAA).

(b) A certificate of insurance on OST Form 6410 evidencing liability insurance coverage meeting the requirements of 14 CFR 205.5(b) for all of its aircraft.

(c) A statement of any changes the holder has undergone in its ownership, key personnel, operating plans, financial posture, or compliance history, since the date of the Show Cause Order in this case.

(d) A revised list of pre-operating expenses already paid and those remaining to be paid, as well as independent verification that the holder has available to it funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.

(2) Pending receipt of effective authority, the holder may not accept payment of any kind (i.e., cash, check, or credit card), issue tickets for the operations proposed under this certificate, or enter into contracts with charter operators, and any advertisement by the holder must prominently state: "This service is subject to receipt of government operating authority."

(3) The holder shall at all times conduct its operations in accordance with the regulations prescribed by the Department of Transportation for the services authorized by this certificate, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.

(4) The holder's authority is effective only to the extent that such operations are also authorized by the FAA.

(5) The holder's authority to provide air transportation with large aircraft (more than 60 seats) shall be limited to its one B727-200 aircraft.

(6) The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. 40102(a)(15).

(7) The holder shall maintain in effect liability insurance coverage as required under 14 CFR Part 205. Failure to maintain such insurance coverage will render a certificate ineffective, and this or other failure to comply with the provisions of Subtitle VII of Title 49 of the United States Code or the Department's regulations shall be sufficient grounds to revoke this certificate.

(8) The holder is not authorized to engage in air transportation operations between points within the State of Alaska.

(9) Should the holder propose any substantial changes in its ownership, management, or operations (as that term is defined in 14 CFR 204.2(n)), it must first comply with the requirements of 14 CFR 204.5.

(10) In the event that the holder does not commence actual flying operations under this certificate within one year of the date of the Department's determination of its fitness, its authority shall be revoked for dormancy. Further, in the event that the holder commences operations for which it was found "fit, willing, and able" and subsequently ceases all such operations, its authority under this certificate shall be suspended under the terms of 14 CFR 204.7 and the holder may not recommence nor advertise such operations unless its fitness to do so has been redetermined by the

Department. Moreover, if the holder does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

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Attachment

SPECIMEN



Terms, Conditions, and Limitations

SUN PACIFIC INTERNATIONAL, INC.

is authorized to engage in foreign charter air transportation of persons, property, and mail:

Between any place in the United States and any place outside thereof.

This authority is subject to the following provisions:

(1) The authority to operate under this certificate will not become effective until six (business) days after the Department has received the following documents; provided, however, that the Department may stay the effectiveness of this authority at any time prior to that date:

(a) A copy of the holder's Air Carrier Certificate and Operations Specifications authorizing such operations from the Federal Aviation Administration (FAA).

(b) A certificate of insurance on OST Form 6410 evidencing liability insurance coverage meeting the requirements of 14 CFR 205.5(b) for all of its aircraft.

(c) A statement of any changes the holder has undergone in its ownership, key personnel, operating plans, financial posture, or compliance history, since the date of the Show Cause Order in this case.

(d) A revised list of pre-operating expenses already paid and those remaining to be paid, as well as independent verification that the holder has available to it funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.

- (2) Pending receipt of effective authority, the holder may not accept payment of any kind (i.e., cash, check, or credit card), issue tickets for the operations proposed under this certificate, or enter into contracts with charter operators, and any advertisement by the holder must prominently state: "This service is subject to receipt of government operating authority."
- (3) The holder shall at all times conduct its operations in accordance with the regulations prescribed by the Department of Transportation for the services authorized by this certificate, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.
- (4) The holder shall at all times conduct its operations in accordance with all treaties and agreements between the United States and other countries, and the exercise of the privileges granted by this certificate is subject to compliance with such treaties and agreements and with any orders of the Department of Transportation issued under them or for the purpose of requiring compliance with them.
- (5) The exercise of the authority granted here is subject to the holder's first obtaining from the appropriate foreign governments such operating rights as may be necessary.
- (6) The holder's authority is effective only to the extent that such operations are also authorized by the FAA.
- (7) The holder's authority to provide air transportation with large aircraft (more than 60 seats) shall be limited to its one B727-200 aircraft.
- (8) The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. 40102(a)(15).
- (9) The holder shall maintain in effect liability insurance coverage as required under 14 CFR Part 205. Failure to maintain such insurance coverage will render a certificate ineffective, and this or other failure to comply with the provisions of Subtitle VII of Title 49 of the United States Code or the Department's regulations shall be sufficient grounds to revoke this certificate.
- (10) Should the holder propose any substantial changes in its ownership, management, or operations (as that term is defined in 14 CFR 204.2(n)), it must first comply with the requirements of 14 CFR 204.5.

(11) In the event that the holder does not commence actual flying operations under this certificate within one year of the date of the Department's determination of its fitness, its authority shall be revoked for dormancy. Further, in the event that the holder commences operations for which it was found "fit, willing, and able" and subsequently ceases all such operations, its authority under this certificate shall be suspended under the terms of 14 CFR 204.7 and the holder may not recommence nor advertise such operations unless its fitness to do so has been redetermined by the Department. Moreover, if the holder does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

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